

MEMO BY FAX

22 December 2005

To: John Wallace
From: Shirley Grindle

Re: Proposed Regulation 18371 re: AB 1234

This proposed regulation appears to be very comprehensive with respect to covering issues of ethics at the state level. I am concerned that local ethics laws/policies are being overlooked in the proposed regulation.

Article 2.4 (Ethics Training), Section 53235(c) of AB 1234 reads:

“(c) If any entity develops curricula to satisfy the requirements of this section, then the Fair Political Practices Commission and the Attorney General shall be consulted regarding the sufficiency and accuracy of any proposed course content. When reviewing any proposed course content the Fair Political Practices Commission and the Attorney General **shall not preclude an entity from also including local ethics policies in the curricula.**” *Emphasis added.*

The proposed regulation does not mention “local ethics policies/ordinances”; in fact, the only reference is to various sections of state law and the state constitution. Of what value is an Ethics Course for local officials IF local ethics policies and ordinances are ignored?

Since the authors of AB 1234 acknowledged the existence of “local ethics policies”, some mention of them should be included in the proposed regulation.

I urge you to include language in the proposed regulation that would, at a minimum, encourage the inclusion of local ethics policies in the course materials. In fact, I find it difficult to understand why inclusion of local ethics policies/ordinances are not **required** to be included in the course material.

Submitted by:

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